

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

TRAXCELL TECHNOLOGIES, LLC

Plaintiff,

y.

CELLCO PARTNERSHIP

Defendant.

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Civil Action No. 6:24-mc-00613-ADA

**DECLARATION OF JACOB K. BARON IN SUPPORT OF  
VERIZON'S OPPOSITION TO TRAXCELL'S MOTION FOR  
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

I, Jacob K. Baron, do hereby state as follows:

1. I am a partner with the firm of Holland & Knight LLP, and am one of the attorneys for defendant Cellco Partnership d/b/a Verizon Wireless in the above-captioned matter. I am a member in good standing of the Bars of the Commonwealth of Massachusetts and the State of New York. I submit this declaration in support of Verizon's Opposition to Traxcell's Motion for Temporary Restraining Order and Preliminary Injunction.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Order issued by the Eastern District of Texas on April 15, 2020 in Case No. 2:17-cv-00718-RWS-RSP.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Order issued by the United States Court of Appeals for the Federal Circuit on October 12, 2021 in Case Nos. 2020-1852, 2020-1854.

4. Attached hereto as Exhibit 3 is a true and correct copy of Verizon's Motion for

Costs filed in the Eastern District of Texas on April 29, 2020 in Case No. 2:17-cv-00718-RWS-RSP.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Memorandum Order issued by the Eastern District of Texas on March 29, 2022 in Case No. 2:17-cv-00718-RWS-RSP.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Amended Order issued by the Eastern District of Texas on September 29, 2022 in Case No. 2:17-cv-00718-RWS-RSP.

7. Attached hereto as Exhibit 6 is a true and correct copy of the Traxcell's Objections to Memorandum Order filed in the Eastern District of Texas on April 11, 2022 in Case No. 2:17-cv-00718-RWS-RSP.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Order issued by the Eastern District of Texas on December 22, 2022 in Case No. 2:17-cv-00718-RWS-RSP.

9. Attached hereto as Exhibit 8 is a true and correct copy of the Notice of Docketing issued by the United States Court of Appeals for the Federal Circuit on January 30, 2023 in Case No. 23-1436.

10. Attached hereto as Exhibit 9 is a true and correct copy of the Judgment issued by the United States Court of Appeals for the Federal Circuit on July 13, 2023 in Case Nos. 23-1246, 23-1436.

11. Attached hereto as Exhibit 10 is a true and correct copy of Traxcell's Petition for Rehearing *en banc* filed with the United States Court of Appeals for the Federal Circuit on July 7, 2023 in Case Nos. 23-1246, 23-1436.

12. Attached hereto as Exhibit 11 is a true and correct copy of the Order on the Petition for Rehearing *en banc* issued by the United States Court of Appeals for the Federal Circuit on August 29, 2023 in Case Nos. 23-1246, 23-1436.

13. Attached hereto as Exhibit 12 is a true and correct copy of the Notice of Petition for writ of certiorari issued by the Supreme Court of the United States on November 28, 2023 in Case Nos. 23-1246, 23-1436.

14. Attached hereto as Exhibit 13 is a true and correct copy of the Order on the Petition for writ of certiorari issued by the Supreme Court of the United States on January 8, 2024 in Case Nos. 23-1246, 23-1436.

15. Attached hereto as Exhibit 14 is a true and correct copy of Traxcell's Emergency Motion filed with the Eastern District of Texas on September 6, 2024 in Case No. 2:17-cv-00718-RWS-RSP.

16. Attached hereto as Exhibit 15 is a true and correct copy of Verizon's Opposition to Traxcell's Emergency Motion filed with the Eastern District of Texas on September 23, 2024 in Case No. 2:17-cv-00718-RWS-RSP.

17. Attached hereto as Exhibit 16 is a true and correct copy of Verizon's Petition to Enforce Foreign Judgment filed with the District Court of McLennan County, Texas on February 10, 2023 in Cause No. 2023-368-4.

18. Attached hereto as Exhibit 17 is a true and correct copy of Verizon's Motion for Post Judgment Turnover Order filed with the District Court of McLennan County, Texas on February 17, 2023 in Cause No. 2023-368-4.

19. Attached hereto as Exhibit 18 is a true and correct copy of the Order Requiring Turnover and Appointing Receiver issued by the District Court of McLennan County, Texas on March 7, 2023 in Cause No. 2023-368-4.

20. Attached hereto as Exhibit 19 is a true and correct copy of Traxcell's Notice of Appeal filed with the District Court of McLennan County, Texas on March 15, 2024 in Case No.

10-23-00081-CV.

21. Attached hereto as Exhibit 20 is a true and correct copy of William P. Ramey, III's April 25, 2023 letter to the District Court of McLennan County, Texas in Cause No. 2023-368-4.

22. Attached hereto as Exhibit 21 is a true and correct copy of Verizon's Petition for Writ of Injunction filed with the Tenth Court of Appeals, Waco, Texas on March 12, 2024 in Case No. 10-24-00074-CV.

23. Attached hereto as Exhibit 22 is a true and correct copy of the Order issued by the Tenth Court of Appeals, Waco, Texas on March 20, 2024 in Case No. 10-24-00074-CV.

24. Attached hereto as Exhibit 23 is a true and correct copy of the Judgment issued by the Tenth Court of Appeals, Waco, Texas on October 22, 2024 in Case No. 10-24-00074-CV.

25. Attached hereto as Exhibit 24 is a true and correct copy of the Judgment issued by the Tenth Court of Appeals, Waco, Texas on November 14, 2024 in Case No. 10-23-00081-CV.

26. Attached hereto as Exhibit 25 is a true and correct copy of Traxcell's Notice of Suggestion on Pendency of Bankruptcy filed with the Bankruptcy Court for the Western District of Texas on September 20, 2023 in Case No. 23-60482-MMP.

27. Attached hereto as Exhibit 26 is a true and correct copy of the Opinion on Motion to Dismiss Case issued by the Bankruptcy Court for the Western District of Texas on January 29, 2024 in Case No. 23-60482-MMP.

28. Attached hereto as Exhibit 27 is a true and correct copy of Traxcell's Original Complaint filed with the Western District of Texas on December 21, 2020 in Case No. 6:20-CV-01175-ADA.

29. Attached hereto as Exhibit 28 is a true and correct copy of the Memorandum Opinion and Order issued by the Western District of Texas on March 14, 2023 in Case No. 6:20-

CV-01175-ADA.

30. Attached hereto as Exhibit 29 is a true and correct copy of the Order Vacating Dismissal Order and Staying Case issued by the Western District of Texas on June 7, 2023 in Case No. 6:20-CV-01175-ADA.

31. Attached hereto as Exhibit 30 is a true and correct copy of Traxcell's Motion to Substitute Plaintiff filed with the Western District of Texas on February 19, 2024 in Case No. 6:20-cv-01175-ADA.

32. Attached hereto as Exhibit 31 is a true and correct copy of Verizon's Original Complaint filed with the Western District of Texas on March 28, 2024 in Case No. 6:24-cv-00163-ADA.

33. Attached hereto as Exhibit 32 is a true and correct copy of Traxcell's Motion to Void Underlying Foreign Judgment as Void filed with the Tenth Court of Appeals, Waco, Texas on September 10, 2024 in Case No. 10-23-00081-CV.

34. Attached hereto as Exhibit 33 is a true and correct copy of the Memorandum Opinion issued by the Tenth Court of Appeals, Waco, Texas on November 14, 2024 in Case No. 10-23-00081-CV.

I declare under penalty of perjury that the foregoing is true and correct.

Date: December 17, 2024

/s/ Jacob K. Baron  
Jacob K. Baron